

11/20/96	1304	6FS Per David McAdoo and Benny Mosier at ACSI, their dial tone is not ready yet and they want this put on hold.
11/20/96	1531	6FS Barbara Gene, Manage is bus ofc. spoke w/ACSI and they told her that this was still on for today. Said that have some translations problems and hope to resolve. She said they will call me. I sure hope they give us time to coordinate.
11/20/96	1600	6FS called RCMAG to touch base to see if any special person dedicated to ALEC orders and talked to Bernice who said no there was-n't. She checked the CRO orders and said that they had already flowed through.
11/20/96	1605	6FS talked to Ann McMillon and Lloyd Mize. It would appear the customer has been out of service since 11/19 at 1619.
11/20/96	1606	6FS called David at ACSI and told him I needed to know what was going on. He said that the cross connect has been made at the SLC but Juan still working on their switch but they were real close to being ready. David said he can't change DD but that a Pam Jones could.
11/20/96	1628	6FS handed off ticket to C.O. indicating IC customer was ready to work item 1 and item 2. Please call Melba before cutting.
11/20/96	1701	6FS Barbara Gene called saying that IC [ACSI] wanted to cut this. Dropped ticket to C.O. and called WMC [Work Management Center] to load.
11/20/96	1702	6FS Frank Thomas called saying that this is not a Toll cut. It will be a cut on the Frame. He got Bobbi on line on frame and she said she worked this yesterday.
11/20/96	1705	6FS called David at ACSI who said they still have problems and are not ready on this but he is real close and will call me back.

11/20/96	1822	6FS has not received call back from ACSI.
11/22/96	1008	Received Sup from Lisa Janders to change Due Date to 11/22/96. (Documentation SPNP request form.)
11/22/96	1829	6FS can't believe the IC called in here at 1645 to work on this. Anyway they did and I got into SMAS and pulled dial tone on both circuits. David called the new 243-0033 and 234-0034 numbers and they seem to be OK. However when you call the old 653-7062 and 7064 you reach a recording saying they are being checked for trouble.
11/27/96	1135	6FS posted order complete

PON I00043CMB

ASR 9633000086

ORD COD35914

11/25/96	1148	Order received via ASR FAX with a DDD of 11/27/96.
11/25/96	1356	Received Sup from ACSI to add FDT of 0900.
11/26/96	1628	Order received into WFA/C.
11/27/96	1355	6DL contacted Craig, ACSI, who requested call prior to cut.
11/27/96	1725	6DL contacted Diane, ACSI, advised problem, agreed to cut Monday 12/2/96.
11/27/96	1812	6DL contacted by Margaret, RCMAG, advised was disconnected in error, put back in service.
12/2/96	1559	6DL attempted cut, had assignment problems in C.O., advised Terri Hinson, ACSI, that we were cutting back. Had new pairs assigned and not reused.
12/2/96	1809	Received Sup from Lisa Janders, ACSI to change DD to 12/20/96.
12/17/96	1154	Order Canceled per WFA Log.

PON I00043CMB**ASR 9633000086****ORD CO7P10V6**

1/6/97	1523	Order received in WFA/C.
1/6/97	1743	6FS did hand-off to C.O. advising them of 0900 cut and to call into conference bridge.
1/6/97	1825	6FS accessed TP and pulled dial tone from ACSI and ANAC'd [verified telephone number]. Number was 706-243-0035.
1/6/97	1830	6FS was told about cut after 1700 and was not able to set this up with RCMAG. Will come in at 0800 and try to get someone set up to work with RCMAG Supervisor John Coleman.
1/6/97	1923	6FS Per Glen Miller, they want us to ANAC our existing svc. Get on caprs [cable pairs] and pull dial tone from our switch and verify.
1/6/97	1933	6FS It is after hours and Frame has gone for the day. I also have no way to put ticket into CCC or Frame to get this done since my only way of HDC is from the GAS order.
1/6/97	1934	6FS has Supervisor Bernice Ford on line in GA CCC trying to explain this to her
1/6/97	2014	6FS Bernice called back and advised Mr. Spencer will go to C.O. but it will be 1 hour before he gets there.
1/6/97	2049	6FS Spencer called and verified that the existing number is on the existing capr.
1/7/97	0854	6FS contacted Vince with ACSI verified release for cut. Was advise OK to cut.
1/7/97	0911	6FS Vince advised physical cut complete. Can test to End User. RCF in progress.
1/7/97	0927	6FS RCF complete and test verified to End User Janice Hodge.

1/7/97	0941	6FS Vince advised post test complete. Refused to accept. Did not want to do any post test verification.
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1/7/97	0958	6FS posted complete.
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PON I00044CMB

ASR 9633000120

ORD COCTR8

11/25/96	1257	Order received in EXACT with DD of 11/27/96 FDT of 1400.
11/25/96	1542	Order received in WFA/C.
11/27/96	0958	6FS is reviewing svc. [service] orders involved. This engineering did not use correct caprs on the order. I have input FAB ticket to correct this.
11/27/96	1132	6FS did hand-off to C.O. advising this is to be cut at 1400.
11/27/96	1212	6FS called C.O. and talked to Lewis who advised he has this wired.
11/27/96	1423	6FS and Charles on Frame began conversion. Discovered an assignment problem in RCMAG.
11/27/96	1457	6FS David McAdoo with ACSI on line.
11/27/96	1602	6FS contacted BellSouth Supervisor Ann McMillon who coordinated with Bernice in RCMAG to resolve discrepancy.
11/27/96	1611	6FS cut began.
11/27/97	1701	6FS Joe Craig in RCMAG advised RCF order is complete.
11/27/96	1714	6FS David McAdoo with ACSI accepted service.

PON I00045CMB**ASR 9633000133****ORD COBTKWX8**

11/25/96	1257	Order received in EXACT with a DD 11/27/96.
11/25/96	1358	Received Sup to add FDT 1100.
11/25/96	1705	Order received in WFA/C.
11/27/96	1220	6DL contacted Craig with ACSI. We were not getting dial tone from his switch. He will check translations and call back.
11/27/96	1246	6DL was called by Craig with ACSI advised not call forwarding properly 706-320-9433.
11/27/96	1711	6DL contacted by Joe Craig advised that call forwarding problem resolved. Contacted Craig with ACSI and turned up for service.

PON I00047CMB**ASR 9633800084****ORD CODKFQ06**

12/3/96	1844	Received order in EXACT with a DD of 12/4/96 FDT of 0900.
12/4/96	1027	Received Sup from Kelly Gallagher, ACSI to change DD to 12/5/97 FDT of 1400.
12/5/96	0937	Received Sup fro Lisa Janders, ACSI to change DD to 12/12/96.
12/11/96	1347	Received Sup from Kelly Gallagher, ACSI to change DD to 12/18/96.
12/11/96	1916	Received Sup from ACSI to change DD to 1/3/97.
12/21/96	1481	Received order in WFA/C.
12/31/96	1058	6DL contacted Blane at ACSI to verify DD for cut. Blane advised can't cut until DD
12/31/96	1106	6DL Blane says we can call whenever ready to cut this.
12/31/96	1222	6DL Blane says OK to cut this at 1430 today

12/31/96	1433	6DL Cut complete on Frame. Numbers being ANAC'd.
12/31/96	1440	6DL completed order to Blane
12/31/96	1441	6DL competed order in WFA/C.

Following are definitions of acronyms and abbreviations used in the foregoing:

A57, KS1, A01, 6FS, 6DL - Owner Code for Technicians working on, or commenting on ticket status.

ANAC - Automatic Number Announcement Circuit

ASR - Access Service Requirement

C.O. - Central Office

CCC - Hand-off should always be dispatch in with a center type of "ccc". (Such as GACCC)

CFA - Connection Facility Assignment

CPG - Circuit Provisioning Group.

CRO - Complete with Related Order

DD - Due date

DDD - Desired Due Date

FAB - Field Assistance Bureau, group responsible for Local Cable Pair maintenance and provisioning change coordination.

FDT - Frame Due Time. When order will be input to the switch translations.

GAS - Georgia Special Order

HDC - Status Narrative ("dispatched in")

ICSC - Interexchange Customer Service

ISC - InterSystems Coupling (TEAM).

LZ - Service Code for Unbundled Loop

NC - Network Channel

ORD - Order

PON - Purchase Order Number

RCF - Remote Call Forward

RCMAG - Recent Change Administrative Group

SPNP - Service Provider Number Portability

Sup. - Short for Supplementary change to an order.

TOTIE - DS0 Level Connection (1 channel)

TN - Telephone Number

TP - Test Point for Switched Maintenance Access System (SMAS).

VMS - Voice Mail System

Response Provided by: Kenneth L. Ainsworth

ACSI-18: For PONs I00042CMB, I00043CMB, I00044CMB, I00045CMB, and I00047CMB, identify the date and time upon which BellSouth claims the installation was completed and all documents upon which you rely for this claim.

Response: See Response to ACSI-17.

Response Provided by: Kenneth L. Ainsworth

ACSI 19: To the extent that final installation of any of the orders identified with PONs I00042CMB, I00043CMB, I00044CMB, I00045CMB, and I00047CMB was delayed, state each and every reason that BellSouth claims contributed to or caused the delay. To the extent your answer refers to an action allegedly taken or failed to be taken by ACSI, identify the action taken or failed to be taken, the ACSI employee (if any) that took or should have taken the action, the date and time the action occurred or should have occurred, and, in the case of an alleged failure to act, the date and time upon which the action allegedly did occur.

Response: See Responses to ACSI-12, ACSI-15 and ACSI-17, the documents referenced in the Responses to ACSI-15, ACSI-17, and BellSouth Documents ##00566-00704.

In addition to the ACSI failures or actions indicated in those responses and documents, the ACSI collocated frame termination in BellSouth's Columbus Main Central Office was labeled (stenciled) as "Cable" and "Pair" instead of "T0TIE." ACSI's vendor responsible for installation and stenciling of the frame, which was previously used equipment, had failed to restencil the frame for its new use. The effect of this failure to make it impossible for BellSouth to find the correct ACSI facility termination for connection of ACSI's unbundled loops. In other words, when ACSI issued an order to BellSouth, the order specified the location on the frame at which BellSouth should connect the unbundled loop. The stenciling on the frame did not match the assignment information provided by ACSI. Thus, circuit continuity could not be established between BellSouth's unbundled loops and ACSI's facilities.

The following timeline prepared by BellSouth Specialist Brian Blanchard describes how BellSouth discovered this problem and the extraordinary steps that BellSouth took to help ACSI correct the problem:

December 12, 1996 - I was contacted by Ken Ainsworth to help determine a provisioning problem with ACSI collocation in Columbus. After looking at several orders and talking over the phone to central office technician, Ken asked me to visit the Columbus central office to determine what the actual problem was.

December 13, 1996 - I went to the Columbus Central office and inspected the ACSI collocation arrangement. The frame termination was labeled as Cable and Pair instead of TOTIE. The central office and ACSI were guessing in an attempt to determine a common scheme. This common scheme was only working with pairs below 96. The frame block terminations were labeled as Cable 1-96, 101-196, 201-296 and 301-396. The central office technician and I tested the first and last channel on each shelf to determine whether the equipment was wired correctly to the frame. I left yellow POST-IT® notes on the frame block terminations with the correct TOTIE designation so that the installation vendor could relabel the frame blocks. With these POST-IT® notes the central office technicians could also wire all future orders to the correct termination.

December 14, 1996 - I participated in a conference call to process service orders and discuss collocation issues for ACSI at Columbus. Determined that Ken Ainsworth and I would talk to Pam Jones at ACSI about the TOTIE assignments.

December 16-19, 1996 - I developed drawings detailing the collocation arrangement and how to read the DLRs. I faxed these drawings to Pam Jones and discussed how to associate the TOTIE carriers to the slot and port on the equipment. After these discussions, I agreed that BellSouth would provide additional notes on the DLR to determine that TOTIE carrier systems have two channels. I had the program that generates the TIE carrier systems updated to include these notes. The Georgia Circuit Provisioning Group added these notes to the TOTIE carrier system DLRs and mailed them to ACSI. (See documents ## 00813-00817, to be produced on April 1)

BellSouth has subsequently found similar stenciling errors on ACSI's equipment in Louisville, Kentucky, Montgomery, Alabama, and Birmingham, Alabama.

Response Provided by: Brian Blanchard and Ken Ainsworth

ACSI 20: Please identify all actions, if any, BellSouth took in response to PONs I00042CMB, I00043CMB, I00044CMB, I00045CMB, and I00047CMB, to coordinate with ACSI the cutover of these customers to ACSI unbundled loops. For each action BellSouth took, your answer should, at a minimum, identify precisely what action was undertaken, the person(s) at BellSouth that took the action, the person(s) (if any) at ACSI that BellSouth contacted, the outcome of the action, and all persons at BellSouth with knowledge of the action taken.

Response: See Response to ACSI-15, ACSI-17, and ACSI-19.

Response Provided by: Brian Blanchard, Ken Ainsworth, Eddie Owens, Martha Jackson

ACSI 21: Please identify all routine reports BellSouth prepares or has prepared on its behalf which refer, identify or relate to the status of orders its receives for the installation, maintenance, or repair of unbundled loops provided by BellSouth, and identify all documents which are, refer to, include, or otherwise relate to any routine reports created during or referring to the period between November 1, 1996 and January 6, 1997.

Response: BellSouth does not produce such routine reports, but has produced the report provided on March 17 as BellSouth Documents ## 00001 *et seq.*

Response Provided by: Kenneth L. Ainsworth

ACSI 22: State the installation interval, as measured from the date upon which BellSouth receives the order to the date of customer delivery, that BellSouth provides services to its own customers, as is referred to in Section IV.D.1 of the Interconnection Agreement, and identify all documents which measure, report, or refer to this interval (including without limitation, all documents upon which BellSouth relies in responding to this interrogatory). If the installation intervals vary for different types of orders, identify each order type and state the installation interval for each.

Response: Installation intervals for exchange services provided to BellSouth's business and residential customers are individually determined based on factors such as the availability of facilities, access to customers' premises and equipment rooms, conduit, electrical power or ground, space on backboards or equipment racks, and work force at the time the order is received. Installation intervals for private line and special access services are based on Customer Desired Due Date, subject to the same factors.

Response Provided by: Kenneth L. Ainsworth

ACSI 23: State the installation and service intervals that BellSouth provides for network elements for use by itself, its affiliates or its own retail customers as is referred to in Section IV.E.3 of the Interconnection Agreement, and identify all documents which measure, report, or refer to these intervals (including without limitation, all documents which BellSouth relies in responding to this interrogatory). If the installation and service intervals vary, identify each different category and state the installation and service intervals for each.

Response: BellSouth has not established installation and service intervals for the provisioning of individual network components used to provide exchange or exchange access services for use by itself, its affiliates, or its retail customers.

Response Provided by: Kenneth L. Ainsworth

ACSI 24: State each measurement of the service quality of leased network elements when BellSouth uses those elements for its own purposes and identify all documents which measure, report, or refer to each measurement (including without limitation all documents upon which BellSouth relies in answering this interrogatory). If your answer varies by element, identify each different category and provide measurements for each.

Response: BellSouth does not understand what is meant by "leased network elements" in this context.

Response Provided by: Kenneth L. Ainsworth

ACSI 25: State how the installation intervals, service intervals, and service quality, as referred to in Sections IV.D.1, IV.E.1, and IV.E.3 of the Interconnection Agreement, compare to that which BellSouth provided to ACSI before January 6, 1997 and identify all documents which measure, report, or refer to BellSouth's performance with respect to ACSI.

Response: See BellSouth Documents ## 00001 *et seq.* At all times before and since January 6, 1997, BellSouth's objective has been to provide network elements on the due dates requested by ACSI, subject to the factors described in the Response to ACSI-22 and to provide a level of quality equivalent to that provided to BellSouth's retail customers. Information provided in response to previous interrogatories demonstrates the extent to which BellSouth has met or failed to meet these objectives.

Response Provided by: Joan Bryant

ACSI 26: Summarize what BellSouth contends its Executive Vice President, Ann Andrews, said to ACSI on December 4, 1996 conference call with regard to the question of whether BellSouth would provide basic provisioning functions (such as order status, jeopardize against due dates, etc.) equivalent to what BellSouth provides to special access customers and identify all documents (including without limitation notes and recorded documents) which record, summarize, refer, or relate to Ms. Andrews' statements on the December 4, 1996 conference call.

Response: BellSouth has found no evidence to indicate that Ann Andrews participated in a conference call with ACSI on December 4, 1996. Documents provided to ACSI on March 17 (BellSouth Documents ##00718-00722, 00755-00757) are hand-written notes of a conference call with ACSI on December 4, 1996. These notes were taken by two different BellSouth employees and do not list Ann Andrews attending this call.

Response Provided by: Paula Murphy, Roger McElroy

The foregoing statements of fact in response to the ACSI interrogatories and the identification of persons responsible for supplying such statements of fact are supported by the Declaration of Alphonso J. Varner appended hereto.

Respectfully submitted,

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Its Attorneys.

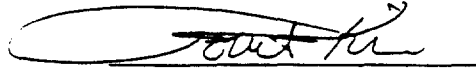
March 28, 1997

CERTIFICATE OF SERVICE

I, Robert G. Kirk, hereby certify that copies of the foregoing Responses and Objections to ACSI's First Set of Interrogatories have been served on the following persons by hand or overnight delivery service this 28th day of March 1997

Brad E. Mutschelknaus, Esquire
Steven A. Augustino, Esquire
Kelley Drye & Warren LLP
1200 19th Street, N.W., Suite 500
Washington, D.C. 20036

Riley M. Murphy, Esquire
James C. Falvey, Esquire
American Communications Services, Inc.
131 National Business Parkway, Suite 100
Annapolis Junction, MD 20701

A handwritten signature in black ink, appearing to read "Robert G. Kirk", is written over a horizontal line.

Robert G. Kirk

EXHIBIT 7

EXHIBIT REMOVED DUE TO CLAIM
OF CONFIDENTIALITY

EXHIBIT 8

ACSI Advanced
Technologies, Inc.

CONFIDENTIAL 131 National Business Parkway, Suite 100
Annapolis Junction, Maryland 20701
(301) 617-4200 • FAX (301) 617-4279

July 9, 1996

Pinky Reichert
OLEC Account Team
Bell South
3535 Colonnade Parkway
Birmingham, AL 35243

Dear Pinky,

I have listed below some of the issues regarded ACSI's ASRs. I hope to submit the final ASRs as soon as ACSI completes our colocation installation in Columbus, GA, now scheduled for July 18, 1996. It looks like I would be submitting ten ASRs (listed below) for each switch that ACSI installs.

There are three switches in the Bell South Region we hope to have installed, tested and in use by year end. The three switches will be installed in Columbus, GA (CLMB), Montgomery, AL (MTGM) and Louisville, KY (LSVL).

I have received confirmation from ACSI's switch engineers that our initial trunking configuration for these switches will be as follows:

	CLMB/MTGM	LSVL
	<u>Trunks</u>	<u>Trunks</u>
1) IntraLATA Originating (Local & Toll)	144	240
2) InterLATA Access (2-Way)	144	192
3) IntraLATA Terminating (Local & Toll)	144	240
4) IntraLATA Choke - Terminating	2	2
5) IntraLATA BOC 800 - Originating	22	22
6) Operator Services - Originating	6	7
7) Directory Assistance - Originating	6	7
8) 911 / E911 - Originating	5	4
9) Intercept - Originating	5	4
10) Busy Verification - Terminating	2	2

This is an overview of some of the Trunk Group parameters:

Trunk Group Type:	Direct Route
Trunk Hunting Sequence:	Highest to Lowest
Trunk Signaling:	SS7 (ASRs 1-5)
	MF (ASRs 6 - 10)
Originate 800/900 Traffic?	Yes
Operator Transfer Capabilities?	Yes
Cut Through Traffic?	Yes
7-digit outpulsing?	10 digit outpulsing
Carrier Selection Parameter?	Yes
Install CPN?	Yes
Coin Equal Access?	Yes
Bearer Capability Routing?	Yes (3.1KHZ, 56KD, 64KE)
Routing Matrix	ALL
Switch Scope	LATA
Line Class Codes	??
PIC Code	??

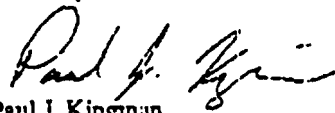
02471

CONFIDENTIAL

As you already know, ACSI will be acting as an end office that subtends off of the Bell South Access Tandem. With that in mind, I have finished a first draft of an ASR for 144 InterLATA (2-way) trunks between our switch (end-office) and the Bell South Tandem. I have attached this ASR for your review. Please let me know if this ASR is accurate.

Pinky, thank you for your help, and please don't hesitate to contact me with any questions or concerns. I can be reached at 301-617-4346.

Sincerely,


Paul J. Kingman
ACSI

02472

*Information sent to field & staff
as information about upcoming orders*
ACSI LOCAL INTERCONNECTION REQUESTS

First Location Columbus Ga (will also serve Phenix City Ala)

CONFIDENTIAL

Requested Due Date 8-30-96

Trunking Requirements:

- 144 IntraLATA Originating (local and toll)
- 144 IntraLLATA Terminating (local and toll)
- 144 InterLATA Access (2 way)
 - 2 IntraLATA Choke
- 22 BOC 800 - Originating
- 6 Operator Services - Originating
- 6 Directory Assistance - Originating
- 5 E911/911
- 5 Intercept - Originating
- 2 Busy Verification - Terminating

Collocation Arrangement in CLMBGAMT scheduled for completion 8-4-96

AT&T 5ESS switch is located at 1044 Front St, Columbus

AC SWCLOC CLMBGAFDDS0

Point Code 005-016-124

NPA/NXX 706 243 has been reserved and will subtend the Columbus tandem

Next location Montgomery Ala

Requested Due Date mid October

Trunking Requirements:

- 144 IntraLATA Originating (local and toll)
- 144 IntraLLATA Terminating (local and toll)
- 144 InterLATA Access (2 way)
 - 2 IntraLATA Choke
- 22 BOC 800 - Originating
- 6 Operator Services - Originating
- 6 Directory Assistance - Originating
- 5 E911/911
- 5 Intercept - Originating
- 2 Busy Verification - Terminating

Collocation Arrangement in MTGMALMT completion date unknown

NPA/NXX 334/363, 334/323 and 334/233 have been reserved

02473 -1